

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

**LINDA M. LESLIE, Regional Director of  
the Third Region of the National Labor  
Relations BOARD, for and on behalf of the  
NATIONAL LABOR RELATIONS  
BOARD**

**No. 1:22-cv-00478-JLS**

**Petitioner,**

**vs.**

**STARBUCKS CORPORATION,**

**Respondent.**

**WORKERS UNITED’S STATUS REPORT**

Movant / amicus curiae Workers United (“Union”) makes this status report pursuant to Judge Sinatra’s November 15, 2022 text order (Dkt. 66).

Workers United and the third-party workers and individuals who were subpoenaed by Starbucks continue to prepare a petition for a writ of mandamus to the Second Circuit Court of Appeals, regarding the appropriateness of Starbucks’ attempt to subpoena thousands of documents showing protected concerted activity, and the Court’s order allowing the same (Dkt. 49). Putting aside Starbucks’ or the Court’s receptivity to them, the issues presented in the petition are complex and involve important policy issues with high stakes. The submission requires reference to several different areas of authority. Counsel for the Union continue to make personal sacrifices in an effort to make the submission to the Second Circuit as quickly as possible, while still giving it its due. This is in addition to preparation and submission of the parties’ post-hearing brief in the underlying

hearing before the NLRB Judge in this same matter, which for the Union totaled over 100 pages, and which was submitted last night.

Given the holiday next week and the work that still needs to be done on the submission to the Second Circuit, counsel for the Union intend to file the petition in the week of November 28, 2022.

Respectfully submitted,

  
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Ian Hayes, Esq.

Cc: Alicia Pender, Esq, via ECF and electronic mail  
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**CERTIFICATE OF SERVICE**

I certify that on November 19, 2022, the foregoing document has been electronically filed with the Clerk of the Court using the CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Ian Hayes

Ian Hayes